

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY REGION II

DATE: FEB 12 1990

SUBJECT: Memo on Nelson Galvanizing Inspection

Paul L. Kahn, OSC FROM: Nelson Galvanizing Site

TO: Nelson Galvanizing File

On 2/11/91 I visited the NGI site to determine the extent of the removal activities done by NGI during the last week, under the apparent 'trained' eye of Metcalf & Eddy personnel.

I arrived at the site at 11:30AM, and found only one person on the premises. The man said he was watching the place because it was shut down for a holiday. I asked him who moved the drums around and he said that it was 4 of the Nelson employees. He said he didn't do any of it because only the most senior employees were allowed to touch these drums.

I observed a large green truck just outside the front door of NGI loaded with scrap wire. The truck had "Nelson Galvanizing Inc. Long Island City, NY" lettered on the driver's door.

I also observed inside the facility:

- 1. a roll-off dumpster was located in the rear (east end) of the premises and contained crushed drums, drum lids, and other debris that was discolored and had evidence of residue on the surfaces.
- 2. approx. 25-55 gal drums were stacked in the middle of the floor and were wrapped with yellow barrier tape and covered with plastic.
- 3. the 3,500 gallon sodium hydroxide tank was filled to the top, and was actually overflowing from a mid point in the rim that had been dented, forming a spout.
- 4. the old galvanizing tank, that had been emptied of its contents, was being used to store drums, some of which appeared to be empty.
- 5. almost all of the drums that had been piled up around the boiler room, approx. 30, had been removed from that area. I was told by the person there that NGI employees had used a special drum harness to pickup the drums and drain them into one of the large tanks. The remaining solid material in the drums was left intact and the drums stockpiled inside the plant.
- 6. all of the drums of waste acid and iron sulphate that had been stored on the dirt floor at the rear door (east side), approx. 28 drums, had been removed, and the doorway was now clear of obstructions.

April 1

- 7. drums of waste acid that had been stored in a long line down the center of the dirt floor had been removed from at least 3 pallets.
- 8. additional drums of soil and gravel had been stockpiled inside the premises. This was soil and debris which I believe had been recently excavated.
- I departed the premises at approx. 12 noon.

cc: M. Mintzer, 20RC

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